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VIA EMAIL AND ECF

May 27, 2022

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The Honorable Martin Glenn
U.S. Bankruptcy Court for the Southern District of New York
One Bowling Green
New York, NY 10004-1408
mg.chambers@nysb.uscourts.gov

Re: Feltman v. Tri-State Employment Service, Adv. No. 17-1013 (Bankr. S.D.N.Y.)

Dear Judge Glenn:

This firm is counsel to James S. Feltman, chapter 11 trustee for TS Employment, Inc. and judgment creditor in the above-referenced adversary proceeding.

At the conclusion of the May 24, 2022 hearing on the Trustee's *Motion for Partial Summary Judgment* [Adv. Dkt. 95] (the "**Partial Summary Judgment Motion**"), the Court asked how the Trustee planned to proceed with respect to the balance of the relief sought in the *Motion for Order Directing Payment of Funds to Judgment Creditor* [Adv. Dkt. 66] (the "**Turnover Motion**") in the event the Court were to grant the Partial Summary Judgment Motion.

If the Court grants the Partial Summary Judgment Motion, the Trustee does not intend to pursue the balance of the claims asserted in the Turnover Motion, and would consent to dismissal of those claims. In that case, the Court could enter proposed findings of facts and conclusions of law in accordance with Rule 9033 of the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rule 9033-1 fully disposing of the Turnover Motion.

If the Court so directs, the Trustee will submit proposed findings of fact and conclusions of law for the Court's consideration.

Thank you for your consideration and attention to this matter.

Sincerely,

/s/ Carl Wedoff
Carl Wedoff

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cc: Lawrence A. Garvey, Esq.
Vincent E. Lazar, Esq.